

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN M. WILSON, <i>et al.</i> ,	X	
	:	<u>Filed Electronically</u>
	:	
Plaintiff,	:	Docket No. 07 Civ. 6176 (LTS)
vs.	:	
	:	
IMAGESAT INTERNATIONAL N.V., <i>et al.</i> ,	:	ORAL ARGUMENT
	:	REQUESTED
Defendants.	:	
	X	

NOTICE OF MOTION

PLEASE TAKE NOTICE that Defendants David Arzi, Yoav Chelouche, Shimon Eckhaus, Moshe Keret, Izhak Nissan, Gino Piperno-Beer and Jacob Weiss (collectively, the “ImageSat D&Os”), by their undersigned attorneys, upon (i) the Joint Memorandum of Law in Support of Motion to Dismiss on Behalf of Defendants ImageSat International N.V., Israel Aerospace Industries Ltd., Elbit Systems Ltd., Moshe Keret, Izhak Nissan, Jacob Weiss, Shimon Eckhaus, Gino Piperno-Beer, David Arzi, Yoav Chelouche, Michael Federmann, Estate of Jacob Toren, Joseph Ackerman, Joseph Gasper and Yehushua Eldar (“Joint Mem.”); (ii) the Memorandum of Law on Behalf of Defendants David Arzi, Yoav Chelouche, Shimon Eckhaus, Moshe Keret, Izhak Nissan, Gino Piperno-Beer and Jacob Weiss; (iii) the Declaration of Deborah Elman and the exhibits attached thereto; (iv) the Declaration of Professor Peter van Schilfgaarde; (v) the Declaration of Dror Vigdor; (vi) the Declarations of David Arzi, Yoav Chelouche, Shimon Eckhaus, Moshe Keret, Izhak Nissan, Gino Piperno-Beer, and all other pleadings and proceedings herein, will move this Court before the Honorable Laura Taylor Swain, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York,

New York, 10017-1312, at a time and date to be set by the Court, for an Order pursuant to Rules 8(a), 9(b), 12(b)(1), 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Complaint with prejudice, and granting such other relief as the Court deems proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 2(b) of the Individual Practices of the Honorable Judge Laura Taylor Swain, undersigned counsel certifies that they conferred with Plaintiffs' counsel on September 7, 2007, and on several other occasions, using their best efforts to resolve or narrow the issues raised in ImageSat D&Os Motion to Dismiss the Complaint, but these efforts were unsuccessful.

Dated: New York, New York
October 15, 2007

Respectfully submitted,

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